

## LAW OFFICES OF JILL R. SHELLOW

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15 Chester Avenue, White Plains, NY 10601

March 1, 2023

### SEALING REQUESTED


#### REQUEST GRANTED.

The Court approves the temporary modification of conditions of Mr. Kung's bond to allow him to travel as proposed.

#### BY ECF AND EMAIL

The Honorable Lewis J. Liman, USDJ  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[LimanNYSDChambers@nysd.uscourts.gov](mailto:LimanNYSDChambers@nysd.uscourts.gov)

3/10/2023 SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

**RE: *United States v. Brian Kung*, 20-cr-129 (LJL)**

Dear Judge Liman:

I represent Brian Kung, and I am writing to request a temporary modification of the conditions of Mr. Kung's bond to allow him to travel to Albany, New York, on March 25-26, 2023. The purpose of the trip is to accompany his girlfriend when she takes her son to the University of Albany for an accepted students' open house. She has no experience with a child who has been accepted to college and is relying on Mr. Kung to help her son. I have consulted with the Assistant United States Attorneys and Mr. Kung's Probation Officer. Both consent so long as Mr. Kung provides details for the trip in advance. Accordingly, I respectfully request that Your Honor permit Mr. Kung to make the trip and direct that he provide specific information, including where he will stay in Albany, at least three days in advance of his departure.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow

Copies by email to:

AUSA Aline Flodr  
AUSA Sebastian Swett  
Probation Officer Jazzlyn Harris  
Brian Kung